



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
EDISON, NEW JERSEY 08837

NOV 19 1991

Mr. Kenneth Fradkin  
Hazardous Materials Specialist  
New York City Department of Environmental  
Protection  
Div. of Hazardous Materials Program  
2444 Municipal Building  
New York, NY 10007

Dear Ken,

I just wanted to let you know that as of November 8, 1991 the removal action at Nelson Galvanizing was completed when the last 14 drums of contaminated sulphate salts was shipped for disposal.

When the last shipment left the site Mr. Sweeney had complied with all of the substantive portions of the consent agreement he signed with EPA. The sole remaining activity is the submission of the final version of the Post Removal Report, which is just about due. I will forward a copy of the report to you as soon as it is issued. This report serves not only to summarize the entire removal action, but it includes a spill prevention/mitigation plan, a plan for the segregation of hazardous substances, emergency response procedures, storage and labeling procedures, and recordkeeping activities. Although not a specific requirement of the consent order, the prospective activities in the plan are quasi-voluntary, and we are relying on the good faith of Nelson Galvanizing to fully implement the provisions. Mr. Sweeney now knows how costly it will be if he again ignores his regulatory obligations, and I am confident that he will be more diligent in the way he operates his business from this point forward.

Nelson Galvanizing still has unresolved legal matters with the EPA RCRA program office, and I think that any resolution will include some long term corrective planning, hopefully in concert with the above mentioned plan provisions. I will be periodically stopping by the facility during my travels in New York City, as will our RCRA inspectors, so I'm sure that we will be able to flag any problems before they get out of control.



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I regret that we didn't get an opportunity to work together on this site, but there are alot more 'Nelsons' around, so the chances of some type of cooperative removal action coming about are good, and I'm looking forward to working with you sometime. Any questions/comments please give me a call.

Sincerely yours,

  
Paul L. Kahn  
On-Scene Coordinator  
Response and Prevention Branch

cc: R. Ciano, DOL-OSHA